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Due Process of Law—Railroad Rate Legislation.—State regulation of local freight rates to and from the Florida & West Shore Railway and over the Seaboard Air Line Railway is held, in *Seaboard Air Line Railway v. Florida*, *Advance Sheets*, U. S. (1906) 109, not to deprive the latter road of its property without due process of law, even if its total receipts from local freight rates are insufficient to meet what can properly be cast as burden upon that business, where, so far as appears, such regulation may have no other effect than to make the rates on the Florida West Shore Railway the same as those obtaining generally in the state.

Foreign Life Insurance Companies—Defenses—Misrepresentations—**Va. Code, § 3344a.**—A foreign life insurance company doing business in Missouri is held, in *Northwestern Nat. L. Ins. Co. v. Riggs*, *Advance Sheets*, U. S. (1906) 126, not to be deprived of its property without due process of law, or denied the equal protection of the laws, by a state statute which cuts off any defense by a life insurance company, domestic or foreign, based upon the false and fraudulent statements in the application, unless the matter misrepresented, in the judgment of the jury, actually contributed to the death of the insured.

Contempt of United States Supreme Court.—Participation in the murder of a prisoner under sentence of death in a state court, with intent to prevent the delay attendant upon an appeal to the Federal Supreme Court from an order of the circuit court denying relief by habeas corpus, and to prevent the hearing of such appeal, is held, in *United States v. Shipp*, *Advance Sheets*, U. S. (1906) 165, to be a contempt of the Supreme Court, where such murder was committed after the appeal had been allowed, and that court had ordered that "all proceedings against the appellant be stayed, and the custody of said appellant be retained pending this appeal."

Contempt—Petition for Rehearing.—A statement in a petition for rehearing that a certain ruling of the court which has been concurred in by several courts of last resort, including that of the United States, is all wrong, and written by politicians and for politics, is held, in *re Chartz* (Nev.) 5 L. R. A. (N. S.) 916, to render the one making it guilty of contempt of court.

Principal and Agent—Notice—Fraud.—The fraud of an agent is held, in *Armstrong v. Ashley*, *Advance Sheets*, U. S. (1906) page 270, not to alter the legal effect of his knowledge with respect to his principal, in regard to third parties who had no connection whatever with such agent in relation to the perpetration of the fraud, and no knowledge that any such fraud had been perpetrated.